

1 RENE L. VALLADARES  
Federal Public Defender  
2 State Bar No. 11479  
JACQUELYN N. WITT  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax  
Jackie\_Witt@fd.org  
6

7 Attorney for Albert Raul Franco

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11

12 Plaintiff,

13 v.

14 ALBERT RAUL FRANCO,  
15

Defendant.  
16

Case No. 2:18-cr-00356-APG-DJA-1

**STIPULATION TO CONTINUE  
REVOCATION HEARING**  
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn N.  
20 Witt, Assistant Federal Public Defender, counsel for Albert Raul Franco, that the Revocation  
21 Hearing currently scheduled on May 24, 2023, be vacated and continued to June 22, 2023 at  
22 2:30 pm or a date and time convenient to the Court, but no sooner than fourteen (14) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. Defense counsel needs additional time to discuss this matter with Mr. Franco  
25 and conduct necessary investigation related to the allegations in the Petitions.  
26 2. Mr. Franco is out of custody and agrees with the need for the continuance.  
3. The parties agree to the continuance.

1 This is the second request for a continuance of the revocation hearing.

2 DATED this 22<sup>nd</sup> day of May, 2023.

3  
4 RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

5  
6 By /s/ Jacquelyn N. Witt

By /s/ Robert Knief

7 JACQUELYN N. WITT  
8 Assistant Federal Public Defender

ROBERT KNIEF  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4

5 Plaintiff,

6 v.

7 ALBERT RAUL FRANCO,  
8

9 Defendant.

Case No. 2:18-cr-00356-APG-DJA-1

**ORDER**

10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for  
11 Wednesday, May 24, 2023 at 10:00 a.m., be vacated and continued to June 22, 2023 at the  
12 hour of 2:30 p.m. in Courtroom 6C.

13 DATED this 23rd day of May, 2023.

14   
15

16 UNITED STATES DISTRICT JUDGE  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26